

STROOCK & STROOCK & LAVAN LLP
JULIA B. STRICKLAND (State Bar No. 083013)
STEPHEN J. NEWMAN (State Bar No. 181570)
BRIAN C. FRONTINO (State Bar No. 222032)
2029 Century Park East
Los Angeles, CA 90067-3086
Telephone: 310-556-5800
Facsimile: 310-556-5959
lacalendar@stroock.com

Attorneys for Defendant
TRANSUNION LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

NOEMIA CARVALHO, on behalf of herself
and other similarly situated people,

Plaintiff,

vs.

CREDIT CONSULTING SERVICES, INC.,
dba CCS, EQUIFAX CREDIT
INFORMATION SERVICES, LLC,
EXPERIAN INFORMATION SOLUTIONS,
INC., TRANS UNION LLC, and DOES 1-50,
inclusive,

Defendants.

Case No. 5:08-cv-01317-JF-HRL

**REQUEST OF DEFENDANT
TRANSUNION LLC TO APPEAR
TELEPHONICALLY AT HEARING ON
TRANSUNION'S MOTION TO COMPEL
PRODUCTION OF DOCUMENTS;
DECLARATION OF BRIAN C.
FRONTINO IN SUPPORT THEREOF**

Date: June 17, 2008
Time: 10:00 a.m.
Crtrm: 2

[[Proposed] Order Lodged Concurrently]

1 Defendant TransUnion LLC (“TransUnion”) respectfully requests to appear telephonically
2 at the hearing on TransUnion’s Motion to Compel Production of Documents currently set for
3 hearing on June 17, 2008, at 10:00 a.m. before the Honorable Howard R. Lloyd.

4 Good cause exists to grant this request because counsel for TransUnion would be required
5 to travel from Los Angeles, California to San Jose, California, such that TransUnion will incur
6 significant travel costs and attorney’s fees at a time when TransUnion is attempting to minimize the
7 cost of litigation in this and numerous other matters. Counsel for TransUnion believes the
8 objectives of this hearing will be accomplished if TransUnion appears by telephone.

9 Dated: June 2, 2008

STROOCK & STROOCK & LAVAN LLP
JULIA B. STRICKLAND
STEPHEN J. NEWMAN
BRIAN C. FRONTINO

By: /s/ Brian C. Frontino
Brian C. Frontino

Attorneys for Defendant
TRANSUNION LLC

STROOCK & STROOCK & LAVAN LLP
2029 Century Park East
Los Angeles, California 90067-3086

DECLARATION OF BRIAN C. FRONTINO

I, Brian C. Frontino, hereby declare:

1. I am admitted to practice before this Court and am associated with Stroock & Stroock & Lavan LLP, counsel for defendant TransUnion LLC ("TransUnion") in the above-captioned matter. I have personal knowledge of the facts stated herein and if called as a witness, I could and would competently testify thereto.

2. My office is located in Los Angeles, California. An in-person appearance at the hearing on TransUnion's Motion to Compel Production of Documents scheduled for June 17, 2008, would require me to travel by plane to San Jose, California and potentially seek accommodations the evening before. This will cause TransUnion to incur significant attorneys' fees and costs for travel time and expenses and would be unduly burdensome on TransUnion at a time when TransUnion is attempting to minimize the cost of litigation in this and numerous other matters.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 2nd day of June, 2008.

/s/ Brian C. Frontino
Brian C. Frontino

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2029 Century Park East
Los Angeles, California 90067-3086

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2029 Century Park East
Los Angeles, CA 90067-3086
Telephone: 310-556-5800
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TRANSUNION LLC

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NOEMIA CARVALHO, on behalf of herself
and other similarly situated people,

Plaintiff,

vs.

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Defendants.

Case No. 5:08-cv-01317-JF-HRL

**[PROPOSED] ORDER GRANTING
REQUEST OF DEFENDANT
TRANSUNION LLC TO APPEAR
TELEPHONICALLY AT HEARING ON
TRANSUNION'S MOTION TO COMPEL
PRODUCTION OF DOCUMENTS**

Date: June 17, 2008

Time: 10:00 a.m.

Crtrm: 2

1 The Request of Defendant TransUnion LLC (“TransUnion”) to Appear Telephonically at
2 the Hearing on TransUnion’s Motion to Compel Production of Documents (the “Request”) came
3 before Magistrate Judge Howard R. Lloyd of the above-captioned Court on or about June 2, 2008.
4 After considering the Request and good cause appearing, **IT IS HEREBY ORDERED** that
5 TransUnion shall be permitted to appear via telephone at the hearing scheduled for June 17, 2008 at
6 10:00 a.m..

7
8 DATED: _____, 2008

The Honorable Howard R. Lloyd
United States Magistrate Judge

9
10 Respectfully submitted,

11 STROOCK & STROOCK & LAVAN LLP
12 JULIA B. STRICKLAND
13 STEPHEN J. NEWMAN
14 BRIAN C. FRONTINO

15 By: /s/ Brian C. Frontino
16 Brian C. Frontino

17 Attorneys for Defendant
18 TRANSUNION LLC
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